

HEARING DATE AND TIME: November 10, 2010 at 10:00 a.m. (Eastern Time)
RESPONSE DEADLINE: October 27, 2010 at 4:00 p.m. (Eastern Time)

Allan Freedman, Esq.
1415 Queen Ann Road, Suite 203
Teaneck, NJ 07666
Telephone: 212-765-9528
Facsimile: 201-692-1500

Attorneys for Boilermaker-Blacksmith National Pension Trust Fund

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: **Chapter 11**
LEHMAN BROTHERS HOLDINGS INC., et al. **Case No. 08-13555 (JMP)**
Debtors. **Jointly Administered**

In re:
STRUCTURED ASSET SECURITIES CORPORATION, **Case No. 09-10558**

Debtor **Claim No. 9807**

**RESPONSE OF BOILERMAKER-BLACKSMITH NATIONAL
PENSION TRUST FUND TO DEBTORS' FORTY-SIXTH
OMNIBUS OBJECTION TO CLAIMS (NO DEBTOR CLAIMS)**

Boilermaker-Blacksmith National Pension Trust Fund (the “Creditor”) hereby responds and states its opposition to the Forty-Sixth Omnibus Objection to Claims (No Debtor Claims), dated September 24, 2010 (the “Objection”) [Dkt. No. 11584], filed by Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors (collectively, the “Debtors”) with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) with respect to Claim No. 9807.

U.S. BANKRUPTCY COURT
2010 OCT 26 AM: 16
S.D. OF N.Y.
FILED
AUG 16 2010

BACKGROUND

1. The Objection requests that the Bankruptcy Court expunge, reduce, reclassify and/or disallow the claim identified in the table below (the “Claim”) on the basis that the Claim violates the procedures and deadlines for filing proofs of claims in these chapter 11 cases (the “Bar Date Order”) [Dkt. No. 4271], as the Claim was filed without specifying a case number or a debtor against whom the claim was asserted.

Creditor Name and Address:	Claim Number:	9807
Boilermaker-Blacksmith National Pension Trust Fund 756 Minnesota Ave. Kansas City, KS 66101	Date Filed:	August 31, 2009
	Debtor:	Structured Asset Securities Corporation
	<i>Case No.</i> Classification and Amount:	09-10558 Unsecured \$208,180.00

2. Notice of the Objection in respect to the Claim (the “Notice”) was given to the Creditor setting forth a procedure and deadline for objecting to the Debtors’ request to disallow and expunge the Claim.

3. Accordingly, this response to the Objection is hereby filed with the Bankruptcy Court, setting forth the information required by the Notice as follows.

4. Creditor is also filing with the Court an Amended Proof of Claim setting forth the specific case number and debtor against whom the claim was asserted.

RESPONSE

1. **Name of the Creditor and Description of the Basis for the Amount of the Claim.**

5. The Creditor is Boilermaker-Blacksmith National Pension Trust Fund. The Creditor purchased 208,180 shares issued by Structured Asset Securities Corporation.

2. Statement Setting Forth the Reasons Why the Claim Should Not Be Disallowed or Expunged.

6. The Creditor timely filed a Proof of Claim with this Court but mistakenly failed to include the name of the Debtor and the Case Number of the Debtor.

7. Creditor has set forth herein the name fo the Debtor and the Case Number of the Debtor. Moreover, once its mistake was pointed out, the Creditor filed an Amended Proof of Claim setting forth the name of the Debtor as well as the Case Number. As a result, any alleged defect in the Proof of Claim has now been cured.

8. The Creditor respectfully requests that the Bankruptcy Court afford the Creditor the opportunity to pursue its claim without it being disallowed or expunged. The Creditor respectfully submits that its actions in connection with the filing of the claim were in good faith.

3. Documentation Evidencing the Claim.

9. Documentation evidencing the claim was attached to both the original Proof of Claim and the Amended Proof of Claim.

4. Address(es) to which the Debtors Must Return any Reply to this Response.

10. Any reply should be addressed to the below:

Allan Freedman, Esq.
1415 Queen Ann Road, Suite 203
Teaneck, NJ 07666
Telephone: (212) 765-9528
Facsimile: (201) 692-1500
Email: tnk10@aol.com
Local Counsel to Creditor

Kurt S. Brack, Esq.
Holbrook & Osborn, P.A.
Commerce Plaza II
7400 W. 110th Street, Suite 600
Overland Park, KS 66210
Telephone: (913) 342-2500
Facsimile: (913) 342-0603
Email: Kbrack@holbrookosborn.com
Counsel to Creditor

5. Name, Address and Telephone Number of the Person Possessing Ultimate Authority to Deal with the Claim.

11. The person possessing ultimate authority to deal with the Claim is:

Thomas Johnson
Brotherhood Bank & Trust
Custodian for Boilermaker-Blacksmith National Pension Trust Fund
756 Minnesota Ave.
Kansas City, KS 66101
Telephone: (913) 321-4242

Respectfully submitted by the undersigned local counsel to the Creditor.

Dated: New York, New York
October 26, 2010



/s/ Allan Freedman

Allan Freedman, Esq.

1415 Queen Ann Road, Suite 203
Teaneck, NJ 07666
Telephone: (212) 765-9528
Facsimile: (201) 692-1500

Local Counsel for Boilermaker-Blacksmith National Pension Trust

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was [electronically] filed this 26th day of October 2010 and sent to:

Honorable James M. Peck
Bankruptcy Court Judge
1 Bowling Green
New York, New York, 10014

Weil Gotshal and Manges, LLP
Attn: Shai Waisman, Esq.
767 5th Avenue
New York, New York, 10153
Attorneys for Debtors

Office of the United States Trustee
for the Southern District of New York
Attn: Andy Balez-Rivera, Esq.
Paul Schwartzverg, Esq.
Brian Masumoto, Esq.
Linda Riffkin, Esq.
Tracy Hope Davis, Esq.
33 Whitehall Street, 21st Street
New York, New York 10004
Trustee

Milbank, Tweed, Hadley and McCloy, LLP
Attn: Dennis F. Dunne, Esq.
Dennis O'Donnell, Esq.
Evan Fleck, Esq.
1 Chase Manhattan Plaza
New York, New York, 10005
Attorneys for unsecured creditors committee



/s/ Allan Freedman
ALLAN FREEDMAN, ESQ.